

Patrick J. Boyle (NJ Bar 036081997)
VENABLE LLP
Rockefeller Center
1270 Avenue of the Americas
24th Floor
New York, New York 10020
(212) 307-5500 (telephone)
(212) 307-5598 (facsimile)
PBoyle@Venable.com
Attorneys for Petitioner
Chronic Disease Fund, Inc.

KARI M. LARSON
Senior Litigation Counsel
KAVITHA BONDADA
Trial Attorney
U.S. Department of Justice, Tax Division
Post Office Box 227
Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 616-3822
(202) 307-6536
Fax: (202) 514-6866
Email: Kari.M.Larson@usdoj.gov
kavitha.bondada@usdoj.gov
Counsel for Respondent United States of America

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
NEWARK VICINAGE**

CHRONIC DISEASE FUND, INC.,

Petitioner,

--against--

UNITED STATES OF AMERICA,

Respondent.

Civil Action No. 17-1082-JMV-JBC

**~~PROPOSED~~ ORDER GRANTING JOINT MOTION AND STIPULATION FOR STAY
OF PETITION AND MOTION TO ENFORCE**

Upon consideration of the Joint Motion and Stipulation for a Stay (the "Joint Motion") and for good cause shown, it is on this 27th day June, 2017, ORDERED that the Joint Motion is GRANTED. The above-captioned action shall be stayed for 90 days while the parties conduct settlement negotiations arising out of the Petition [ECF No. 1] and Motion to Enforce [ECF No. 6].

On or before September 15, 2017, the Parties shall file a joint status report stating whether: a) the stay should remain in place, in which case the Parties will identify the further length of time for which they believe a stay is appropriate; or b) the stay shall be lifted. Should the controversy be resolved in the interim, the Parties shall advise the Court, and CDF shall withdraw its petition.

The motion to enforce [Docket Entry No. 6] shall be administratively terminated. Said motion shall be re-filed, if and when the stay is lifted.

BY THE COURT:



The Hon. James B. Clark III, U.S.D.J.
U.S.M.J.

[This Order terminates Docket Entry Nos. 6 and 8.]